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Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF PLAINTIFF
WAYMO LLC'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL ITS
SUBMISSION TO SPECIAL MASTER
COOPER REGARDING UBER'S
OBLIGATION TO PRODUCE
JACOBS LETTER AND RELATED
DOCUMENTS (DKT. 2367)**

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this
3 declaration based upon matters within my own personal knowledge and if called as a witness,
4 I could and would competently testify to the matters set forth herein. I make this declaration in
5 support of Plaintiff Waymo LLC's Administrative Motion to File Under Seal Its Submission to
6 Special Master Cooper Regarding Uber's Obligation to Produce Jacobs Letter and Related
7 Documents ("Submission") (Dkt. 2367).

8 2. I have reviewed the following documents and confirmed that only the portions
9 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Exhibit 1	Redacted portions in public refileing at Dkt. 2401-1
Exhibit 2	Yellow-highlighted portion in attached version
Exhibit 3	Blue-highlighted portion on page 18
Exhibit 10	Red boxes
Exhibit 14	Red boxes

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19 3. I understand that Exhibit 1 to Waymo's Submission is the same document as
20 Exhibit B to the Court's November 29, 2017 Order (Dkt. 2307-2), for which the Court has already
21 granted sealing with respect to the green-highlighted portions of that document. (Dkt. 2307 at 2.)
22 The Court's December 13, 2017 Order also granted additional redactions to Exhibit A to the
23 Boersch Declaration (Dkt. 2382), which are also reflected in the public re-filing of Dkt. 2307-2.
24 (Dkt. 2401-1.) Exhibit 1 to Waymo's Submission contains information that implicates the safety,
25 privacy, and reputational interests of former and current Uber employees and vendors, as well as
26 various third party individuals and entities. Defendants support sealing of the redacted portions in
27 Dkt. 2307-2 and Dkt. 2401-1.
28

6. The blue highlighted-portion on page 18 of Exhibits 3 and the red boxes on Exhibit 10 contain highly confidential information regarding a list of Uber's internal servers. I understand that disclosure of this information could compromise the security and privacy of these internal servers.

8. Defendants' request to seal is narrowly tailored to the portions of exhibits to Waymo's Submission that merit sealing.

Michelle Yang